

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,

Plaintiff,

v.

DONALD J. TRUMP,

Defendant.

No. 22 Civ. 10016 (LAK)

PROPOSED VERDICT FORM

Claim One: Battery

1. Has Ms. Carroll proved, by a preponderance of the evidence, that Defendant committed a battery?

Yes _____ No _____

[If “Yes,” proceed to question two. If “No,” skip to question five.]

2. Has Plaintiff proved, by a preponderance of the evidence, that Defendant engaged in conduct that would constitute:

- a. Forcible Touching?

Yes _____ No _____

- b. Sexual Abuse?

Yes _____ No _____

- c. Rape?

Yes _____ No _____

[If “Yes” to a, b, or c, proceed to questions three and four. If “No” to a, b and c, skip to question five.]

3. Indicate in the line below how much you award in compensatory or nominal damages.

\$ _____

4. Indicate in the line below how much you award in punitive damages.

\$ _____

Claim Two: Defamation

5. Has Plaintiff proved:

- a. By a preponderance of the evidence that Defendant's statement was defamatory?

Yes _____ No _____

- b. By a preponderance of the evidence that Defendant's statement would be reasonably understood to be about her?

Yes _____ No _____

- c. By a preponderance of the evidence that Defendant published the statement?

Yes _____ No _____

- d. By clear and convincing evidence that Defendant's statement was false?

Yes _____ No _____

- e. By clear and convincing evidence that Defendant made the statement with actual malice?

Yes _____ No _____

[If "Yes" to a, b, c, d, and e, proceed to questions six and seven. If "No" to a, b, c, d, or e, stop here and return your verdict.]

6. Indicate in the line below how much you award in compensatory or nominal damages.

\$ _____

7. Indicate in the line below how much you award in punitive damages.

\$ _____

Dated: _____, 2023.

Signatures:

